

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
Norfolk Division**

DRAGAS MANAGEMENT CORPORATION,

Plaintiff,

v.

Civil Action No. 2:10cv547

HANOVER INSURANCE CO., et al.,

File Under Seal

Defendants.

**DRAGAS MANAGEMENT CORPORATION'S MOTION TO SEAL CERTAIN
PORTIONS OF ITS REPLY MEMORANDUM IN SUPPORT OF MOTION FOR
PARTIAL SUMMARY JUDGMENT AND EXHIBITS M, P, Q, AND R
TO THE SUPPLEMENTAL DECLARATION OF KRISTAN B. BURCH**

Pursuant to Local Rule 5 and the Motion for Protective Order recently submitted to the Court [Dkt. No. 26], plaintiff, Dragas Management Corporations ("DMC"), respectfully moves this Court for entry of the attached Order permitting DMC to file under seal (1) Certain Portions of DMC's Reply Memorandum in Support of Motion for Partial Summary Judgment ("Summary Judgment Brief"), and (2) Certain Confidential Exhibits M, P, Q and R to the Supplemental Declaration of Kristan B. Burch ("Certain Confidential Exhibits"). Grounds and authorities for this Motion are set forth in DMC's Memorandum in Support of Motion to Seal. In compliance with Local Rule 5, DMC attaches a Proposed Agreed Order as **Exhibit 1** and is filing separately a Public Notice of DMC's Motion to Seal. DMC requests that the Court retain sealed materials until forty-five (45) days after a final order is entered and requests that, unless the case is appealed, any sealed materials be returned to counsel for the filing parties. The parties have agreed that confidential materials should be filed under seal.

Dated: February 1, 2011

Respectfully submitted,

DRAGAS MANAGEMENT CORPORATION

By: /s/ R. Johan Conrod, Jr.
W. Edgar Spivey (VSB No. 29125)
Kristan B. Burch (VSB No. 42640)
R. Johan Conrod, Jr. (VSB No. 46765)
KAUFMAN & CANOLES, P.C.
150 West Main Street, Suite 2100
Norfolk, VA 23510
Telephone: (757) 624-3000
Facsimile: (757) 624-3169
wespivey@kaufcan.com
kbburch@kaufcan.com
rjconrod@kaufcan.com
*Counsel for Dragas Management
Corporation; Hampshires Associates, LC;
and Dragas Associates X, LC*

CERTIFICATE OF SERVICE

I hereby certify that on February 1, 2011, I will electronically file the foregoing with the Clerk of Court using the CM/ECF system, which will send a Notice of Electronic Filing (NEF) to the following registered users:

Thomas S. Garrett, Esq.
Harman, Claytor, Corrigan & Wellman
P. O. Box 70280
Richmond, VA 23255
(804) 747-5200
(804) 747-6085 Facsimile
tgarrett@hccw.com
Counsel for Hanover Insurance Company, and Citizens Insurance Company of America

John Malloy, Esq.
Robinson & Cole, LLP
280 Trumbell Street
Hartford, CT 06103
jmalloy@rc.com
Counsel for Hanover Insurance Company, and Citizens Insurance Company of America

/s/ R. Johan Conrod, Jr.
W. Edgar Spivey (VSB No. 29125)
Kristan B. Burch (VSB No. 42640)
R. Johan Conrod, Jr. (VSB No. 46765)
KAUFMAN & CANOLES, P.C.
150 West Main Street, Suite 2100
Norfolk, VA 23510
Telephone: (757) 624-3000
Facsimile: (757) 624-3169
wespivey@kaufcan.com
kbburch@kaufcan.com
rjconrod@kaufcan.com
Counsel for Dragas Management Corporation; Hampshires Associates, LC; and Dragas Associates X, LC